

EXHIBIT C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) ECF Case
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This document relates to:

Ashton v. Al Qaeda Islamic Army, 02-CV-6977

Burnett v. Al Baraka Investment & Development Corp., 03-CV-5738

Cantor Fitzgerald Associates, LP v. Akida Investment Co., Ltd., 04-CV-7065

Continental Casualty Co. v. Al Qaeda Islamic Army, 04-CV-05970

Euro Brokers, Inc. v. Al Baraka Investment & Development Corp., 04-CV-07279

Federal Insurance Co. v. Al Qaida, 03-CV-6978

Estate of O'Neill v. Al Baraka Investment & Development Corp., 04-CV-1923

**PLAINTIFFS' FIRST SET OF JURISDICTIONAL REQUESTS FOR PRODUCTION OF
DOCUMENTS DIRECTED TO DEFENDANT SOLIMAN H.S. AL-BUTHE**

THE MDL 1570 PLAINTIFFS'
EXECUTIVE COMMITTEES
August 22, 2013

15. Please provide all documents relating to any meetings of officers, directors, trustees, shareholders, managers, boards, committees, and/or internal bodies of Al Haramain, including without limitation, any agendas or meeting minutes.

RESPONSE:

16. Please provide statements for all banking and financial accounts held by Al Haramain.

RESPONSE:

17. Please provide documents (including bank or financial statements) relating to all banking or financial accounts held by You or any member of Your family that have been used to send, receive, or otherwise transfer Al Haramain Funds.

RESPONSE:

18. Please provide all documents relating to Your authority, role, duties, and responsibilities (for Al Haramain or otherwise) concerning volunteers, delegations, or other groups or individuals active in Afghanistan, Albania, Algeria, Bangladesh, Bosnia & Herzegovina, Island of Comoros, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Netherlands, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

RESPONSE:

19. Provide all documents relating to Your travel to the United States for any purpose, including without limitation copies of Your Saudi Arabia Passport B049614 and Saudi Arabia Passport C536660.

47. Please provide all documents relating to all accounts You hold or have held with or on behalf of Al Haramain, and/or all Al Haramain accounts over which You hold or have held any responsibility or authority, including signatory authority, including but not limited to the following accounts:

- A. Bank of America, Account number 28803-14895 (Ashland, OR Branch 2880);
- B. Bank of America, Account number 28803-11561 (Ashland, OR Branch 2880);
- C. Bank of America, Account number 28804-15615 (Ashland, OR Branch 2880).
- D. Bank of America, Account number 34733-86549 (Kansas City, MO); and
- E. Bank of America, Account number 34733-24381 (Springfield, MO);
- F. Capital One Corporation Account.

RESPONSE:

48. Please provide all documents relating to all financial transactions or donations by You or Al Haramain or from any account in which You held a direct or beneficial interest, or over which You held signatory authority, involving individuals or entities Designated by the United States Government regardless of whether the individual or entity was Designated before or after the financial transaction or donation.

RESPONSE:

49. Please provide all documents relating to any investigation, inquiry, review, audit, due diligence or analysis conducted by any United States state or federal governmental entity or any United States-based regulatory body, bank, financial institution, accountant, or auditor ("United States Investigator"), by the Kingdom of Saudi Arabia or any Saudi-based regulatory body, bank, financial institution, accountant, or auditor ("Saudi Investigator"), or by any other

against such defendant. Responsive documents shall include, but are not limited to, contracts, agreements, insurance policies, term sheets, or other records.

RESPONSE:

58. Please provide all documents relating to any understanding or agreement between You and any individual, entity, and/or government, whereby such party has agreed to pay, indemnify, or reimburse You for any of the costs associated with defending this lawsuit, including legal fees and/or payments to satisfy part or all of a judgment that may be entered in this action against You. Responsive documents shall include, but are not limited to, contracts, agreements, insurance policies, term sheets, or other records.

RESPONSE:

59. Provide all documents relating to all accounts in United States financial institutions ("U.S. Accounts") held in Your personal capacity, on Your behalf, or by You as an official of a charity or business and/or any U.S. Accounts over which You hold or have held signatory authority, including but not limited to, correspondence, letters, memoranda, notes, and e-mails, that refer to, relate to, or reflect any communications between or among You and the U.S. financial institution, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from Your account.

RESPONSE:

60. Please provide all documents relating to any investments made within the United States ("U.S. Investments") on Your behalf, either in Your personal capacity, in Your capacity as

a director, officer, trustee, advisor and/or member of a corporation, partnership, organization, or trust, or for Your benefit through a holding company, corporation, partnership, organization, trust or other entity.

RESPONSE:

61. Please provide all documents relating to any filing submitted by You, or Your agent acting on Your behalf, to any local state and/or federal agency, including without limitation, the Internal Revenue Service, Securities Exchange Commission, Department of Justice, Department of Treasury, and the Office of Foreign Assets Control.

RESPONSE:

62. Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between companies owned by You and/or in which You held an equity interest, and Al Haramain.

RESPONSE:

63. Please provide all documents relating to Your relationship with, communication with, and/or supervision, management, or control over any of the entities listed below, including any subsidiary or branch office thereof, including without limitation, correspondence, working papers, reports, memoranda (including, but not limited to, inter and intra-office communications), notes, diaries, logs, appointment books, calendars, messages (including, but not limited to, reports of telephone conversations and conferences), meeting minutes and lists of persons attending meetings.

- A. Saudi Joint Relief Committee for Kosovo and Chechnya
- B. Saudi Red Crescent

- C. International Islamic Relief Organization
- D. Muslim World League
- E. World Assembly of Muslim Youth
- F. Islamic Assembly of North America
- G. Islamic Society of North America
- H. Council on American-Islamic Relations
- I. Muwafaq Foundation

RESPONSE:

64. Please provide all records relating to any contributions, donations, gifts, grants, *zakat*, and/or any other financial or non-monetary support, to any of the co-defendant ostensible Charities¹, made by You, on Your behalf, at Your Direction, with Your authorization/approval, or by or on behalf of any foundations, trusts, committees and/or other entities (i) formed by You, (ii) funded by You, (iii) established in Your name, and/or (iv) for which You held a position as director, officer, trustee or other position. If the contribution was made by wire transfer, please provide records identifying the name of the individual who sent the money, the bank from which the money was sent, the wire transfer number, the recipient of the funds, the bank which received the wire transfer and the bank account numbers of the sender and receiver.

RESPONSE:

65. Please provide all records relating to any contributions, donations, gifts, grants, *zakat*, and/or any other financial or non-monetary support, made by You, on Your behalf, at Your Direction, with Your authorization/approval, or by or on behalf of any foundations, trusts,

¹ The term "co-defendant ostensible Charity" includes any part or branch of any defendant in 03 MDL 1570 that has represented itself as a charitable organization, including, in addition to Al Haramain, the Muslim World League, the International Islamic Relief Organization, the World Assembly of Muslim Youth, Sana-Bell, and Sanabel al Kheer.